



**U.S. Department of Justice**

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October 12, 2023

**Via Electronic Filing**

Hon. Michael A. Shipp, U.S.D.J.  
United States District Court  
Clarkson S. Fisher Building  
& U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

**Re: Letter Requesting Five-Day Extensions of Time to Answer  
Plaintiffs' Complaints  
*B.Y.C.C., et al. v. United States*, No. 22-cv-06586-MAS  
*J.A.L.C., et al. v. United States*, No. 22-cv-06587-MAS  
*R.J.P., et al. v. United States*, No. 22-cv-06588-MAS**

Dear Judge Shipp:

This Office represents Defendant the United States of America in the above-referenced matters. We write with the consent of Plaintiffs' counsel to respectfully request an additional five days for the United States to answer Plaintiffs' Complaints. The Court previously granted the United States 30-day extensions of time to answer the Complaints, *see* ECF No. 33 (*B.Y.C.C.*); ECF No. 30 (*J.A.L.C.*); ECF No. 32 (*R.J.P.*), and, subsequently, 14-day extensions of the time to answer, *see* ECF No. 35 (*B.Y.C.C.*); ECF No. 32 (*J.A.L.C.*); ECF No. 34 (*R.J.P.*). The current date by which the United States must file its answer in each of the above-referenced cases is October 12, 2023. If the Court grants the United States' extension requests, its answers will be due on October 17, 2023. We respectfully submit that good cause exists to grant these extensions because Department of Justice components require additional time to obtain the necessary approvals to authorize this Office to file the answers.

If this proposal is acceptable to the Court, we respectfully request that Your Honor "so order" this letter and have the clerk file it on the docket. Thank you very much for your consideration of these requests and continued attention to this matter.

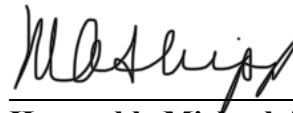
Respectfully submitted,

PHILIP R. SELLINGER  
United States Attorney

By: /s/ Samantha R. D'Aversa  
SAMANTHA R. D'AVERSA  
Assistant United States Attorney  
*Attorneys for the United States*

cc: All counsel of record  
AUSA John F. Basiak Jr.  
AUSA Angela Juneau

**So Ordered this 12th day of October, 2023**

A handwritten signature in black ink, appearing to read "M. Shipp", written over a horizontal line.

**Honorable Michael A. Shipp, U.S.D.J.**